

"A FRIEND FOR LIFE"



## WOODBURN AMBULANCE & Health Care Supplies

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

22, February 1993

To Whom it May Concern:

I am writing this letter of concern regarding **FCC docket 92-235**. As a small private provider of emergency paramedic ambulance a primarily rural setting the proposed rules changes would cause the greatest of financial and logistical hardships on our service and as a result could jeopardize the safety of the communities we serve and the paramedics we employ.

We currently operate on several frequencies interacting on a regular basis with 11 fire agencies and four(4) police agencies. We all operate within current band width allocations and changing our entire system to the proposed 4khz bandwidth would prove to be a logistical and financial nightmare for several reasons.

1. Most of the agencies we work with are small rural volunteer fire departments or or police agencies from communities of less than 1000 population. These agencies will not be able to budget the funds necessary to change their equipment to the new standard this century, especially in the aftermath of Oregon's property tax limitation law.
2. If even one agency or area 911 center opts. to apply for a waiver that agency would in effect be isolated from communicating with the 911 center or other agencies offering mutual aid. This **will** place the public being served by that agency and their personnel at considerable risk for personal injury and property loss.
3. The logistics of changing all area agencies and 911 centers to the new frequency allocations on the same day at the same time, which is the only option due to system and hardware incompatibility, would be impossible.
4. Woodburn Ambulance Service inc. is a small progressive private provider of professional Paramedic ambulance service with a commitment to providing the highest level of prehospital medical care to the communities we serve. By attempting to fix a problem that does not exist for this region we will be faced with the reality of needing to delay replacement of medical equipment such as ambulances and heart monitors which have limited life spans and high replacement costs. Our estimated capital outlay for radio replacement for our agency will be approximately \$200,00.00 not including the likely increase in dispatch fees or surcharges to pay for equipment

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FCC docket #92-235

changes at area 911 centers. These costs will place the community we serve at risk and could jeopardize our ability to continue to offer paramedic ambulance service on a twenty-four hour basis.

After considering the points in this letter I am certain that you will conclude that the risks, logistical and financial considerations of these proposed change will far outweigh any possible benefit of fixing an system which works without problems currently and will likely function in the future without difficulties. Thank you for considering our comments.

Sincerely,



Jeffrey T. Birrer  
Paramedic

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